

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEBRASKA

IN RE DEWAYNE LONG,)	CASE NO. BK 09-82347
)	
Debtors,)	
)	
)	<u>MOTION TO AVOID LIENS</u>
)	

COMES NOW debtor and moves the Court to avoid various alleged liens for the following reasons:

1. Claims have been filed by various creditors claiming secured status and claiming liens on the debtor's property;
2. Such claimants include Wachovia (Claim #15), JP Morgan (Claim #5), and Wells Fargo (Claims #12 & #14).
3. That this Court already denied JP Morgan's claim (Filing #5) on January 20, 2010 so avoiding that lien should be done as a matter of law already, but if not, then this motion applies to that claim as well.
4. That Wachovia (Claim #15) and Wells Fargo's (Claims #12 & #14) claims have been properly objected to by the debtor directly (and indirectly by resisting the objections to Plan confirmation filed by those debtors as well) and that this Court should uphold the reasons set forth in those objections and resistances filed by the debtor and then avoid said claimed liens.

WHEREFORE the debtor prays that his motion be granted.

LAST DATE TO FILE RESISTANCE

TO TRUSTEE AND INTERESTED PARTIES:

You are hereby notified that Dewayne Long has filed a Motion to Avoid Liens.

The last date to file an Objection or resistance to said Motion is 23 days from the date of this notice, or **February 28 2010**.

Please govern yourselves accordingly.

/s Michael B. Kratville
Michael B. Kratville #18255
11920 Burt Street
Suite 145
Omaha, Nebraska 68154
(402) 391-5153
FAX (402) 393-0629

Attorney for Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was emailed on the ECF system on the 4th day of February 2010 to all counsels of record in the BK proceeding and by US mail to all parties requesting mail service and/or not a part of the ECF system.

/s Michael B. Kratville